

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

Beth Amendola, et al. Plaintiff,

- against -

Bristol-Myers Squibb Defendant.  
 Company

7 cv 6088 ( )

**MOTION TO ADMIT COUNSEL**

**PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Steven Wittels a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: David Sanford  
 Firm Name: Sanford Wittels & Heisler, LLP  
 Address: 1666 Connecticut Ave, NW, Suite 310  
 City/State/Zip: Washington, DC 20009  
 Phone Number: (202) 742-7780  
 Fax Number: (202) 742-7776

David Sanford is a member in good standing of the Bar of the States of Maryland and the District of Columbia

There are no pending disciplinary proceeding against David Sanford in any State or Federal court.

Dated:

City, State: New York, NY

Respectfully submitted,

Sponsor's  
 SDNY Bar SLW-8110  
 Firm Name: Sanford Wittels & Heisler, LLP  
 Address: 950 Third Ave, 10th Fl  
 City/State/Zip: New York, NY 10022  
 Phone Number: (646) 723-2454  
 Fax Number: (646) 723-2948

FILED  
 2007 NOV -5 PM 9:48  
 S.D. OF N.Y.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**BETH AMENDOLA, individually and on  
behalf of a class of all other persons  
similarly situated**

Plaintiffs,

v.

**BRISTOL-MYERS SQUIBB  
COMPANY, and Does 1 through 20,  
inclusive,**

Defendants.

Civil Action No. 1:07-cv-06088-DLC

**AFFIDAVIT OF STEVEN L. WITTELS  
IN SUPPORT OF MOTION TO ADMIT  
DAVID SANFORD *PRO HAC VICE***

State of New York            )  
  )  
County of New York        )           ss:

Steven L. Wittels, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Sanford Wittels & Heisler, LLP, counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit David Sanford as counsel *pro hac vice* to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the States of New York and New Jersey and was admitted to practice law in 1984 and 1985, respectively. I am also admitted to the bar of the United States District Court of New Jersey and for the Southern and Eastern Districts of New York.
3. I have known David Sanford for more than thirty years.

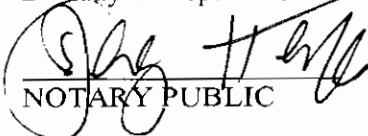
4. David Sanford is a partner at the Washington, D.C. offices of Sanford Wittels & Heisler, LLP, 1666 Connecticut Avenue, N.W., Suite 310, Washington, D.C. 20009. He is admitted to the bar in the State of Maryland, and in the District of Columbia.
5. I have found David Sanford to be a skilled attorney and a person of exemplary integrity. He is highly experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move for the admission of David Sanford, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of David Sanford, *pro hac vice*.

WHEREFORE it is respectfully requested that the motion to admit David Sanford, *pro hac vice*, to represent Plaintiffs in the above captioned matter, be granted.

Respectfully submitted,

  
Steven L. Wittels, SLW-8110

Sworn to before me this  
20<sup>th</sup> day of September 2007

  
NOTARY PUBLIC

**JEREMY HEISLER, ESQ.**  
NOTARY PUBLIC, STATE OF NEW YORK  
KINGS COUNTY  
Reg. No. 02HE6140741  
Qualified in New York County  
My Commission Expires Feb. 6, 2010



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 1200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

DAVID W. SANFORD

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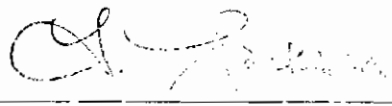
was on the 3<sup>rd</sup> day of APRIL, 1998

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duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on October  
5, 2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the twenty-fifth day of June, 1997,*

**David Weissbord Sanford**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
fourth day of October, 2007.*

  
*Alexander L. Cummings*  
Clerk of the Court of Appeals of Maryland

## SDNY Form Web 10-2006

AFFIDAVIT OF SERVICE

STATE OF NEW YORK                    )  
  ) ss.  
COUNTY OF NEW YORK                )

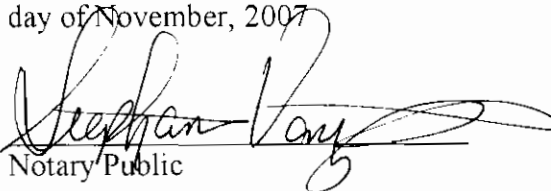
I, Katherine Blakeley, am and at all times herein mentioned was a citizen of the United States, over the age of eighteen years, not a party to or interested in the above entitled action and competent to be a witness therein.

On the 1st day of November, 2007, I served true and accurate copies of Plaintiff's MOTION FOR ADMISSION OF DAVID W. SANFORD PRO HAC VICE, by electronic notification to the following :

Bettina B. Plevan  
Joshua F. Alloy  
PROSKAUER ROSE LLP  
1585 Broadway  
New York, NY 10036-8299  
*Counsel for Defendant Bristo-Meyers Squibb*

By: S/   
Katherine Blakeley

Sworn to before me this \_\_\_\_<sup>th</sup>  
day of November, 2007

  
Notary Public

STEPHANIE VANGELATOS  
NOTARY PUBLIC, STATE OF NEW YORK  
QUEENS COUNTY, Reg. No. 01VA6143514  
My Commission Expires April 10, 20 10